

SEALED

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

1. **ROBERTO CHRISTIAN**
- JIMENEZ-HEYER**, a/k/a "Forty,"
2. **ANGEL MEJIA ZELAYA**, a/k/a "Stackz,"
3. **BRANDON BAEZ**, a/k/a "Big Baby"
4. **JOSUE RODRIGUEZ**, a/k/a "SB,"
and a/k/a "Superbad,"
5. **WILFREDO DELACRUZ**,
6. **HENRY DEL-RIO**, a/k/a "Junior,"
7. **ELYHAS DIAZ**, a/k/a "Boi Boi,"
8. **ANNA GARCIA**,
9. **CHRISTIAN GONZALEZ**, a/k/a "Chee,"
10. **JESSIKA HEYER**,
11. **JERRY LEIVA**, a/k/a "Fetti,"
12. **JOSE PEREZ**, and
13. **EMMITT SIMPKINS**, a/k/a "Easy,"

Defendants.

Cr. No. 15-cr-10256-RGS

(MPK)

VIOLATIONS:

- 18 U.S.C. § 1962(d) --
Conspiracy to Conduct Enterprise
Affairs Through a Pattern of
Racketeering Activity
- 21 U.S.C. § 846 --
Conspiracy to Distribute Cocaine,
Cocaine Base, and Heroin
- 18 U.S.C. § 922(k) --
Possession of a Firearm with
an Obliterated Serial Number
- 18 U.S.C. § 922(a)(1)(A) --
Engaging in the Business of Dealing
in Firearms without a License
- 21 U.S.C. § 841(a)(1)
Possession of Cocaine Base with
Intent to Distribute
- 18 U.S.C. § 924(c)(1)(A)
Possession of a Firearm in
Furtherance of a Drug Trafficking
Crime
- 21 U.S.C. § 856(a)(2) --
Maintaining a Drug Involved
Premises
- 21 U.S.C. § 853 --
Drug Forfeiture Allegation
- 18 U.S.C. § 924(d) and
28 U.S.C. § 2461(c) --
Firearm Forfeiture Allegation

GOVERNMENT'S MOTION TO SEAL AND UNSEAL INDICTMENT

Pursuant to FRCP 6(e)(4), the United States of America hereby moves this Court to direct that the indictment be sealed (and that no person shall disclose the return of the indictment except when necessary for the issuance and execution of a warrant) until 8:00 a.m. on Thursday, June 9, 2016, at which time the indictment should be unsealed.

The United States further moves, pursuant to General Order 06-05 that the United States Attorney, through undersigned counsel, be provided copies of all sealed documents which the United States has filed in this matter.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By:



EMILY CUMMINGS
MICHAEL CROWLEY
Assistant U.S. Attorneys

Date: June 8, 2016

